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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEAN DELEON,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

CASE NO. 2:24-cv-02778-JAM-SCR

**FIRST STIPULATION AND ORDER
MODIFYING PRETRIAL SCHEDULING
ORDER**

The parties respectfully stipulate to an extension of deadlines in this matter and move the Court to extend the deadlines in accordance with the parties' proposed new schedule:

	Current deadline	Proposed deadline
Discovery	11/21/2025	2/19/2026
Expert witness disclosure	9/26/2025	12/19/2025
Rebuttal expert disclosures	10/10/2025	1/23/2026
Dispositive motion deadline	1/16/2026 (filed) 3/24/2026 (heard)	4/16/2026 (filed) 6/23/2026 (heard)
Final pretrial conference	5/22/2026	August 2026
Trial	7/6/2026	October 2026

1 The parties respectfully submit that this request is supported by good cause. The parties have
2 diligently exchanged written discovery including initial disclosures, interrogatories, and substantial
3 document production. They also have completed depositions of three fact witnesses. During the July
4 17, 2025 deposition of Plaintiff Sean DeLeon, however, the parties learned that several of Mr. DeLeon's
5 medical providers had failed to provide Plaintiff's counsel with a significant number of treatment
6 records—which, in turn, meant that Defendant lacked material information necessary to conduct Mr.
7 DeLeon's deposition. The parties continued the deposition by agreement so Plaintiff could obtain the
8 additional medical records. Unfortunately, the process has taken longer than anticipated. Although
9 Plaintiff has obtained additional medical records and made a supplemental production to Defendant on
10 August 13, 2025, there are still missing records, and it is presently unclear when the medical providers
11 will provide those records.

12 Despite their diligence, the parties do not believe they can feasibly meet the current case
13 schedule under the circumstances. The parties therefore respectfully request that the current case
14 deadlines be extended by approximately 90 days. The parties anticipate that this extension will permit
15 sufficient time to gather all necessary medical records to complete Mr. DeLeon's deposition and submit
16 expert reports conforming to Fed. R. Civ. P. 26 and Fed. R. Evid. 702.

17 Therefore, for the foregoing reasons, the parties respectfully request that the Court extend the
18 current case deadlines to those proposed in this stipulation.
19

20 Dated: August 13, 2025

21 By: /s/ Brodie M. Butland
22 BRODIE M. BUTLAND
23 Assistant United States Attorney
Counsel for the United States of America

24 Dated: August 13, 2025

25 By: /s/ Daniel M. Kruid (per 8/13/25 consent)
26 DANIEL M. KRUID
27 AlderLaw, PC
28 Counsel for Plaintiff

ORDER MODIFYING PRETRIAL SCHEDULING ORDER

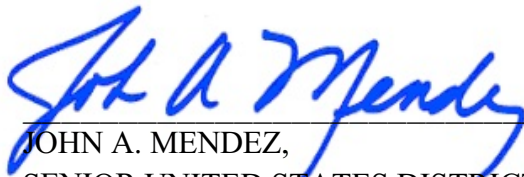
Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	New Deadline
Discovery Cutoff Date	02/19/2026
Disclosure of Expert(s) Deadline	12/19/2025
Supplemental Disclosure Deadline	01/23/2026
Joint Mid-Litigation Statement Filing Deadline	Fourteen (14) days prior to the close of discovery
Dispositive Motion Filing Deadline	04/17/2026
Dispositive Motion Hearing	06/16/2026, at 01:00 p.m.
Joint Pretrial Statement Filing Deadline	Seven (7) days prior to the final pretrial conference
Final pretrial conference	08/14/2026, at 10:00 a.m.
Jury Trial (3-4 Days)	09/28/2026, at 9:00 a.m.

All other instructions contained in the February 24, 2025 Pretrial Scheduling Order (ECF No. 14) shall remain in effect.

IT IS SO ORDERED.

August 19, 2025



JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE